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May 20, 2020

By ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Zurich North American Insurance Company, et al.,*
v. Savino del Bene S.p.A., et al.
1:20-cv-00802-LGS
Our File: 6270

Dear Judge Schofield,

We represent Plaintiffs in the captioned matter and write to advise the Court that Plaintiffs are currently in negotiations with (1) Savino del Bene S.p.A (“SDB Italy”) and Savino del Bene USA, Inc. (“SDB USA”) (collectively “SDB Entites”) to assume their rights against Defendants ASF Intermodal, Inc. (“ASF”) and Containerport Group (“Containerport”) (collectively “ASF Defendants”) and (2) the ASF Defendants to procure their written consent to the contemplated assignment noted above.

Because the Parties have agreed in principal to the above-stated arrangement, are working together to finalize that arrangement, but require additional time to do so, they respectfully request the following interim schedule be ordered:

- (1) Plaintiffs must file the Amended Complaint contemplated by the Parties’ anticipated assignment arrangement on or before 10 June 2020;
- (2) In light of the anticipated filing of an Amended Complaint, the deadline for all Defendants to answer the original Complaint is adjourned *sine die*;
- (3) All Defendants named in the Amended Complaint must answer it by or before 24 June 2020;

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(4) The initial conference in this matter scheduled for 28 May 2020 is adjourned until a date to be set by the Court after 24 June 2020.

The Parties thank your Honor for considering this request – the first of its kind.

So Ordered. The initial pretrial conference ("IPTC") scheduled for May 28, 2020, is adjourned to **June 25, 2020, at 10:50 a.m.**

Respectfully,

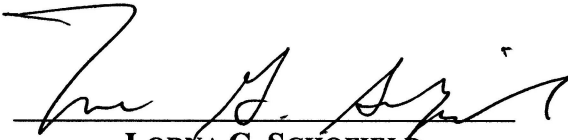
KENNEDY LILLIS SCHMIDT & ENGLISH

By: *s/ Nathan T. Williams*

Nathan T. Williams

The parties shall file an updated joint status letter and proposed case management plan at least seven days before the IPTC, or by **June 18, 2020**.

Dated: May 21, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE